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April 7, 2023

The Honorable Michael B. Kaplan  
United States Bankruptcy Court, District of New Jersey  
Clarkson S. Fisher US Courthouse  
402 East State Street, Courtroom #8  
Trenton, NJ 08608

Re: LTL Mgmt. LLC, Adv. Proc. No. 23-01092 (MBK)

Dear Chief Judge Kaplan:

I write regarding the *Second Amended Ex Parte Temporary Restraining Order* [Dkt. 16] (the “Second Amended TRO”), which the Court entered today in the above-referenced adversary proceeding. Following communications with counsel to certain talc claimants, the Debtor has agreed to request that the Court enter a further revised form of order amending paragraph 8 of the Second Amended TRO to provide express clarification that statutes of limitations are tolled with respect to Debtor Talc Claims asserted against any Protected Party.

The Debtor therefore requests that the Court enter the proposed third amended form of order enclosed herewith as Annex I, which incorporates the clarification described above. A redline to the Second Amended TRO, as entered by the Court today, is enclosed herewith as Annex II.

Respectfully submitted,

/s/ Daniel J. Merrett

Daniel J. Merrett

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